

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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GLORIA CAVALUZZI,

11 CIV 3545 (CS)

Plaintiff,

ANSWER

-against-

PRECISION PIPELINE, LLC and
MILLENNIUM PIPELINE COMPANY, LLC,

Defendants.
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The defendant, PRECISION PIPELINE, LLC, by its attorneys, LITCHFIELD
CAVO, LLP, answering the plaintiff's Complaint, herein upon information and belief:

1. Denies any knowledge or information sufficient to form a belief as to each
and every allegation contained in the paragraphs of the Complaint numbered "1" and "4"
through "22".

2. Admits the allegations contained in the paragraphs of the complaint
designated "2" and "3".

3. Denies each and every allegation contained in the paragraphs of the
Complaint numbered "23" through "27".

AS TO THE ALLEGED SECOND CAUSE OF ACTION

4. Defendant repeats and realleges its answers to the allegations contained in
paragraphs "1" through "27" of the Complaint which is recited in paragraph "28" thereof,
with the same force and effect as if fully set forth herein at length.

5. Denies each and every allegation contained in the paragraphs of the
Complaint numbered "29" through "33".

AS TO THE ALLEGED THIRD CAUSE OF ACTION

6. Defendant repeats and realleges its answers to the allegations contained in paragraphs "1" through "33" of the Complaint which is recited in paragraph "34" thereof, with the same force and effect as if fully set forth herein at length.

7. Denies each and every allegation contained in the paragraphs of the Complaint numbered "35" through "38".

AS TO THE ALLEGED FOURTH CAUSE OF ACTION

8. Defendant repeats and realleges its answers to the allegations contained in paragraphs "1" through "38" of the Complaint which is recited in paragraph "39" thereof, with the same force and effect as if fully set forth herein at length.

9. Denies each and every allegation contained in the paragraphs of the Complaint numbered "40" through "43".

AS TO THE ALLEGED SECOND CAUSE OF ACTION

10. Defendant repeats and realleges its answers to the allegations contained in paragraphs "1" through "43" of the Complaint which is recited in paragraph "44" thereof, with the same force and effect as if fully set forth herein at length.

11. Denies each and every allegation contained in the paragraphs of the Complaint numbered "45" through "47".

AS TO THE ALLEGED SECOND CAUSE OF ACTION

12. Defendant repeats and realleges its answers to the allegations contained in paragraphs "1" through "47" of the Complaint which is recited in paragraph "48" thereof, with the same force and effect as if fully set forth herein at length.

13. Denies each and every allegation contained in the paragraphs of the Complaint numbered "49" through "51".

AS TO THE ALLEGED SECOND CAUSE OF ACTION

14. Defendant repeats and realleges its answers to the allegations contained in paragraphs "1" through "51" of the Complaint which is recited in paragraph "52" thereof, with the same force and effect as if fully set forth herein at length.

15. Denies each and every allegation contained in the paragraphs of the Complaint numbered "53" through "55".

AS AND FOR A FIRST AND COMPLETE AFFIRMATIVE DEFENSE

Any damages allegedly sustained by plaintiff were caused by plaintiff's own contributory negligence and/or culpable conduct.

AS AND FOR A SECOND AND COMPLETE AFFIRMATIVE DEFENSE

That upon information and belief, the plaintiff's injuries and damages, if any, were caused by the intervening acts of third parties unrelated to this answering defendant.

AS AND FOR A THIRD AND COMPLETE AFFIRMATIVE DEFENSE

The Complaint fails to state a cause of action.

AS AND FOR A FOURTH AND COMPLETE AFFIRMATIVE DEFENSE

This action is barred by lack of timeliness as it was brought after the applicable statute of limitations had run.

AS AND FOR A FIFTH AND COMPLETE AFFIRMATIVE DEFENSE

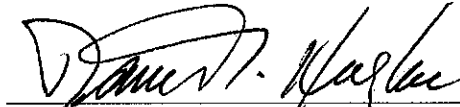
Plaintiff is barred from bringing suit on the ground of laches.

AS AND FOR A SIXTH AND COMPLETE AFFIRMATIVE DEFENSE

That plaintiff has failed to set forth a cause of action under Title VII, 42 U.S.C. §2000(e).

WHEREFORE, defendant demands judgment dismissing plaintiff's complaint against it, together with the costs and disbursements of this action, and for any expense incurred by them in the defense thereof, including attorneys' fees.

Dated: New York, New York
July 28, 2011



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